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December 18, 2015

Filed via ECF

Honorable Vernon S. Broderick
United States District Judge
Southern District of New York
40 Foley Square, Room 415
New York, New York 10007

Re: United States v. John W. Ashe, et., al (Ng Lap Seng)
Docket No. 15 cr. 706 (VSB)

Dear Judge Broderick:

We are co-counsel with Brafman & Associates for Ng Lap Seng in the above-referenced matter. We write in connection with our request to amend the bail conditions related to one of the co-signors of the bail bond, Yuan Sun, aka Crystal Sun, Mr. Ng's daughter-in-law. Pursuant to the Court Order of November 5, 2015, Ms. Sun was permitted to travel to China to care for her family and to return on or before December 19, 2015, to surrender her passport, and while she is in Macau she is not permitted to work at Sun Kian Ip Group Co., Ltd, a company owned by Mr. Ng. Pursuant to an agreement with the Government, we hereby request that Ms. Sun be permitted to return to China with her family on January 2, 2016 and to care for her chronically ill son and disabled mother, with the understanding that she will return to the States on a future date to be agreed by the parties and that she is permitted to work at Sun Kian Ip Group handling sales and maintenance of Windsor Arch condominium complex which she has been doing for the past 10 years. Ms. Sun will remain as a co-signor on the bail bond.

Pursuant to our request, the Government has no objections to Ms. Sun holding on to her passport between her arrival yesterday and her proposed departure on January 2, 2016. We have notified Pre-trial Services of our request and the Government's consent and have yet to receive a response.

We respectfully request the Court to grant an amendment of the conditions attached to Ms. Sun as a suretor. Thank you for your kind consideration.

Respectfully yours,

Hugh H. Mo

cc: All counsel of record via ECF
Dennis Khilkevich, Pre-Trial Services (via email)